

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

TWANA AHMED,	:	
	:	
Plaintiff,	:	Case No. 4:23-cv-02823
	:	
v.	:	Hon. Judge Lee H. Rosenthal
	:	
UNIVERSAL PROTECTION SERVICE,	:	
LP d/b/a ALLIED UNIVERSAL	:	
SECURITY SERVICES,	:	
	:	
Defendant.	:	
	:	

**DEFENDANT UNIVERSAL PROTECTION SERVICE, LP'S
OBJECTIONS TO PLAINTIFF'S EXHIBIT LIST**

Defendant Universal Protection Service LP d/b/a Allied Universal Security Services (“Allied” or “Defendant”) file its Objections to Plaintiff Twana Ahmed’s Exhibit List (ECF No. 45-1) as follows:

**I. ISSUES REGARDING THE AUTHENTICITY OF DOCUMENTS SHOULD
BE ADDRESSED AT TRIAL.**

Defendant maintains that all issues regarding admissibility of exhibits, including objections based on authenticity, should be addressed at trial. At that time, Defendant will present evidence to establish the authenticity of any exhibits objected to on the grounds of authenticity. Pursuant to Judge Rosenthal’s Court Procedure 12.B, Defendant will submit written objections to Plaintiff’s exhibits at least seven (7) days prior to trial.

**II. OBJECTIONS TO PLAINTIFF'S EXHIBITS CONCERNING
AUTHENTICITY.**

In the interim, Defendant is identifying which of Plaintiff’s exhibits it has objections to on the basis of authenticity. Based on information known to date, Defendant objects as to the authenticity of the following exhibits: Plaintiff’s Exhibits Nos. 31-32, 36-38, 41-44, 46-47, 79-83.

Defendant reserves the right to supplement, amend, or withdraw its objections as additional information becomes available or as necessary to comply with the Court's orders and procedures.

III. OBJECTIONS TO PLAINTIFF'S EXHIBITS CONCERNING PATTERN AND PRACTICE OF DISCRIMINATION.

During the May 9, 2025 Docket Call, the Court granted Defendant's Motion in Limine No. 1, excluding all evidence related to an alleged pattern or practice of discrimination by Defendant. Accordingly, Defendant hereby objects to Plaintiff's Exhibit Nos. 70-72 and 77-79 on the grounds that those exhibits constitute alleged evidence of a pattern and practice of discrimination and are therefore inadmissible.

Dated: July 31, 2025

Respectfully submitted,

MARTENSON, HASBROUCK & SIMON LLP

/s/ Jessica E. Chang

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CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2025, I caused to be served a true and correct copy of the foregoing document on all counsel of record via electronic mail as follows:

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